

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SERAP LOKMAN, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

AZURE POWER GLOBAL LIMITED,  
RANJIT GUPTA, MURALI SUBRAMANIAN,  
and PAWAN KUMAR AGRAWAL,

Defendants.

Case No. 1:22-cv-7432

Hon. Gregory H. Woods

**LEAD PLAINTIFF'S UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT AND PLAN OF ALLOCATION**

Pursuant to Federal Rule of Civil Procedure 23(e), Lead Plaintiff Serap Lokman (“Lead Plaintiff”) hereby moves this Court for an Order granting final approval of (1) the proposed Settlement resolving this Action for the payment of \$23.0 million in cash for the benefit of the Settlement Class in consideration for fully resolving all claims alleged in this Action, and (2) the proposed Plan of Allocation of the proceeds of the Settlement.<sup>1</sup>

As set forth more fully in the accompanying Memorandum of Law, and the Declaration of Shannon L. Hopkins in Support of (I) Lead Plaintiff’s Unopposed Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (II) Lead Counsel’s Motion for Attorneys’ Fees, Reimbursement of Litigation Expenses, and Award to Lead Plaintiff filed herewith, the Settlement, including the Plan of Allocation for distribution of the Net Settlement Fund to members of the Settlement Class, satisfies each of the legal requirements for final approval under Rule 23(e) of the Federal Rules of Civil Procedure and the precedent of this Circuit, and the proposed Settlement Class meets all of the requirements for certification under Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure. Lead Plaintiff has conferred with Defendants, who do not oppose the relief requested in this Motion.

Dated: August 1, 2025

Respectfully submitted,

**LEVI & KORSINSKY, LLP**

By: /s/ Shannon L. Hopkins  
 Shannon L. Hopkins (SH-1887)  
 Gregory M. Potrepka (GP-1275)  
 Andrew E. Lencyk (AL-4329)  
 David C. Jaynes (admitted *pro hac vice*)  
 Morgan M. Embleton (admitted *pro hac vice*)  
 Amanda D. Foley (admitted *pro hac vice*)

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement (“Stipulation”) (ECF No. 119-1). Lead Counsel are also filing concurrently herewith a Motion for Attorneys’ Fees, Reimbursement of Litigation Expenses, and Award to Lead Plaintiff, and a Memorandum of Law in support thereof.

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*Lead Counsel for Lead Plaintiff and the Class*